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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:  
**PG&E CORPORATION,**  
  
**- and -**  
  
**PACIFIC GAS AND ELECTRIC COMPANY,**  
  
**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

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Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STATEMENT OF DEBTORS  
REGARDING STATUS OF  
RESOLUTION OF PHILIP  
VERWEY FARMS' ("PVF")  
MOTION FOR RELIEF FROM  
AUTOMATIC STAY TO EXERCISE  
SETOFF PURSUANT TO 11 U.S.C.  
§§ 362 AND 553**

[Relates to Dkt. No. 1141]

Date: August 28, 2019  
Time: 9:30 a.m.  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned Chapter 11 Cases (the “**Chapter 11 Cases**”), respectfully submit this statement regarding the efforts to resolve Philip Verwey Farms’ (“**PVF**”) <sup>1</sup> *Motion for Relief from Automatic Stay to Exercise Setoff Pursuant to 11 U.S.C. §§ 362 and 553* (the “**Motion**”) [Dkt. No. 1141].

At the Court’s direction, the parties have attempted to resolve the Motion by entering into a stipulation by which PG&E would commit to forbearance from its collection efforts against PVF (but not any of the related entities) until PVF’s claims are resolved through the claims allowance process. Counsel for the Debtors and PVF have corresponded and exchanged drafts of a proposed stipulation and order, but, due to various conflicting schedules, have not yet reached agreement on all terms. The Debtors are hopeful that agreement will be reached, but cannot assure that will occur before the continued hearing date.

The Debtors propose that, if the parties are unable to conclude an agreement prior to the August 28 hearing, the hearing on the Motion be continued another two weeks (to September 10) so the parties may have more time to finalize their stipulation. The Debtors are currently forbearing from collection activity against PVF (or any of its related entities) on account of their prepetition obligations to PG&E, and will continue to forbear during the proposed continuance.

Respectfully submitted,

Dated: August 23, 2019

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER & BENVNUTTI LLP**

By: /s/ Peter J. Benvenutti  
Peter J. Benvenutti

*Attorneys for Debtors and Debtors in Possession*

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<sup>1</sup> The motion papers and relevant proofs of claim identify the moving party and creditor as Philip Verwey d/b/a Philip Verwey Farms – in other words, as an individual/sole proprietorship.